

Proceeding: **INQUIRY CONCERNING THE DEPLOYMENT OF ADVANCED TELECOMMUNICATIONS** ☒ Record 1 of 1
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As the network engineer for the University of California at Santa Cruz one of my assigned duties is to provide networking assistance to schools through their county education offices. While the opinions here are based on my experience working with the COEs, they are my own and not those of this campus nor of the University.

These are my comments on "NOTICE OF INQUIRY FCC 98-187"

Paragraph 64 invites education especially to respond to the NOI. I believe that the Commission is excessively optimistic in the hope that the NOI process is one which the education community can embrace. If the commission truly seeks advice from Education, I believe that you will need to find another way to get it. I am aware of perhaps one very large school district that has staff advice that might be able to respond to such a request. Unlike LECs and IXC's who have staff members that live, eat and breathe for words to and from the Commission, K-12 staff basically are not going to get your message.

Paragraph 65 requests comments on rural areas. I have found that considerable attention and energy is directed into matters related to rates. The need to minimize costs in the procurement of services that cross a LATA boundary takes a disproportionate share of the energy and attention from people who should be doing other things. The confluence of several tariffs, state contract rates and two separate education support programs -- one federal, one state, makes the normally difficult situation of understanding telecommunications rates much more challenging. The Commission and the state PUCs should consider making it an affirmative requirement that the LECs and IXC's assist schools, libraries and rural health care providers in navigating the maze and finding the lowest possible rates.

My experience with the boundary between California's LATAs 1 & 8 is that it creates a special problem of a communications dead zone. Since the LEC can't cross the magic line, there's no financial incentive to get close and advanced services stay miles away. Note that here the rural problem is exacerbated by the LATA boundary. If the Commission wants to assure that rural education has access to advanced services on an equal footing with their urban counterparts, a special fast-track subsidy of 100 percent of the LEC's special construction charges would bring quick parity.

Paragraph 65 also asks for comments on wireless. My personal wish is that schools would purchase the services they need at reasonable rates rather than put their energy into building WANs. And it seems that it is the Commission's position that a wireless link to cure a LATA rift within a school district is outside the scope of the E-rate program. I have had some interesting discussions with school officials who don't understand how the program as we understand it supports technology neutrality. We have been working for months to get radio engineering studies and quotes for a radio link to join two schools in the North Monterey County School District. While I fully expect this project to be a success, it stands as an excellent example of

something that would never have happened if the District could have purchased a 3 mile T-1 at typical intraLATA urban rates.

I note that another item, NPRM 98-188, has specific proposals which may address the rural areas unfortunate enough to have LATA boundaries as neighbors. This can only help. I believe that in California, the "incidental exception" for K12 to the LATA rule written into the Communications Act of 1996 has been entirely ignored and that, in effect, these exemptions are not available. I would welcome a report from the Commission about how this exemption is used in other states.

Thank you for your consideration.

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